

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

1. GREAT LAKES INSURANCE SE,	)	
	)	
Plaintiff,	)	
	)	Case No. CIV-22-00702-JD
vs.	)	Judge Jodi W. Dishman
	)	
2. FREDY VALLE d/b/a VALLE	)	
TRUCKING;	)	
3. SILVER STAR CONSTRUCTION	)	
COMPANY, INC.;	)	
4. TYLON MACKEY;	)	
5. ISRAEL JUAREZ;	)	
6. ORD TRUCKING, INC.	)	
7. ZURICH AMERICAN INS. CO.,	)	
	)	
Defendants,	)	
	)	
<hr style="width: 40%; margin-left: 0;"/>		
8. ZURICH AMERICAN INS. CO.,	)	
	)	
Defendant/Third Party	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
9. PROGRESSIVE NORTHERN INS.	)	
CO.,	)	
	)	
Third-Party Defendant.	)	

**DEFENDANT TYLON MACKEY’S FINAL EXHIBIT LIST**

Defendant Tylon Mackey, pursuant to the Court’s Scheduling Order (Doc. No. 56), respectfully submits its Final Exhibit List.

**Exhibits**

<b>No.</b>	<b>Description</b>	<b>Will be used/May be used</b>
1.	Accident Report for Underlying Accident (ZAIC_00001-ZAIC_000012)	May be used
2.	7/20/2007 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000013)	May be used
3.	10/4/2007 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000014)	May be used
4.	10/22/2008 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000015)	May be used
5.	5/7/2009 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000016)	May be used
6.	5/12/2009 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000017)	May be used
7.	7/9/2010 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000018)	May be used
8.	8/17/2010 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000019)	May be used
9.	9/14/2010 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000020)	May be used
10.	9/15/2010 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000021)	May be used
11.	10/5/2010 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000022)	May be used

12.	1/14/2011 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000023)	May be used
13.	1/14/2011 Affidavit of No Operations, Fredy N. Valle Sr. (ZAIC_000024)	May be used
14.	1/26/2011 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000025)	May be used
15.	4/12/2011 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000026)	May be used
16.	5/18/2011 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000027)	May be used
17.	5/19/2011 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000028)	May be used
18.	8/16/2011 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000029)	May be used
19.	11/7/2012 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000030)	May be used
20.	1/6/2015 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000031)	May be used
21.	3/12/2014 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000032)	May be used
22.	2/20/2015 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000033)	May be used
23.	10/29/2015 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000034)	May be used

24.	10/19/2015 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000035)	May be used
25.	1/26/2016 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000036)	May be used
26.	2/22/2016 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000037)	May be used
27.	4/25/2016 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000038)	May be used
28.	10/5/2016 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000039)	May be used
29.	6/1/0217 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000040)	May be used
30.	4/24/2018 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 9/7/2017 (ZAIC_000041)	Will be used
31.	11/20/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 11/15/18 (ZAIC_000042)	Will be used
32.	6/1/2017 Oklahoma Corporation Commission Form K, Valle Trucking, Progressive Northern Insurance Company, coverage cancelled effective 1/11/2019 (ZAIC_000043)	Will be used
33.	12/10/2018 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 1/11/2019 (ZAIC_000044)	Will be used
34.	12/18/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 12/18/18 (ZAIC_000045)	Will be used
35.	12/5/2019 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 7/12/2019 (ZAIC_000046)	Will be used

36.	3/15/2013 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 3/7/2013 (ZAIC_000047)	May be used
37.	5/4/2015 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 4/27/2015 (ZAIC_000048)	May be used
38.	4/30/2015 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 4/30/2015 (ZAIC_000049)	May be used
39.	5/17/2016 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 5/17/2016 (ZAIC_000050)	May be used
40.	11/27/2018 Oklahoma Corporation Commission Form E, Ord Trucking, Shelter General Insurance Company, coverage effective from 10/29/2018 (ZAIC_000051)	May be used
41.	9/2/2020 Oklahoma Corporation Commission Form K, Ord Trucking, Shelter General Insurance Company, coverage cancelled effective 11/7/2020 (ZAIC_000052)	May be used
42.	10/20/2020 Oklahoma Corporation Commission Form E, Ord Trucking, Progressive Northern Insurance Company, coverage effective from 11/7/2020 (ZAIC_000053)	Will be used
43.	7/20/2007 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company, coverage effective from 7/19/2007 (ZAIC_000054)	May be used
44.	10/4/2007 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company, coverage cancelled effective 10/25/2007 (ZAIC_000055)	May be used
45.	10/22/2008 Oklahoma Corporation Commission Form E, Fredy Valle, United Financial Casualty Company, coverage effective from 3/17/2008 (ZAIC_000056)	May be used
46.	5/7/2009 Oklahoma Corporation Commission Form K, Fredy Valle, United Financial Casualty Company, coverage cancelled effective 6/11/2009 (ZAIC_000057)	May be used
47.	5/12/2009 Oklahoma Corporation Commission Form E, Fredy Valle, United Financial Casualty Company, coverage effective from 5/11/2009 (ZAIC_000058)	May be used

48.	7/8/10 Oklahoma Corporation Commission Form K, Fredy Valle, United Financial Casualty Company, coverage cancelled effective 8/12/2010 (ZAIC_000059)	May be used
49.	8/17/10 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 8/17/2010 (ZAIC_000060)	May be used
50.	9/13/10 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 10/15/2010 (ZAIC_000061)	May be used
51.	9/15/10 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 10/15/2010 (ZAIC_000062)	May be used
52.	10/5/10 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 11/5/2010 (ZAIC_000063)	May be used
53.	1/14/2011 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 11/24/2010 (ZAIC_000064)	May be used
54.	12/30/2010 Affidavit of No Operations, Fredy N. Valle Sr. (ZAIC_000065)	May be used
55.	1/26/2011 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 1/20/2011 (ZAIC_000066)	May be used
56.	4/12/2011 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 5/16/2011 (ZAIC_000067)	May be used
57.	5/18/2011 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 5/16/2011 (ZAIC_000068)	May be used
58.	5/19/2011 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 5/16/2011 (ZAIC_000069)	May be used
59.	8/16/2011 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 9/15/2011 (ZAIC_000070)	May be used

60.	11/17/2012 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 11/6/2012 (ZAIC_000071)	May be used
61.	1/16/2015 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 2/16/2015 (ZAIC_000072)	May be used
62.	3/12/2014 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/18/2014 (ZAIC_000073)	May be used
63.	2/20/2015 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/16/2015 (ZAIC_000074)	May be used
64.	10/29/2015 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 10/26/2015 (ZAIC_000075)	May be used
65.	10/19/2015 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 11/16/2015 (ZAIC_000076)	May be used
66.	1/26/2016 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/26/2016 (ZAIC_000077)	May be used
67.	2/22/2016 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 3/25/2016 (ZAIC_000078)	May be used
68.	4/25/2016 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 3/25/2016 (ZAIC_000079)	May be used
69.	10/5/16 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 8/25/2016 (ZAIC_000080)	May be used
70.	6/1/17 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 7/5/2017 (ZAIC_000081)	May be used
71.	4/24/2018 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 9/7/2017 (ZAIC_000082)	May be used



72.	11/20/2018 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 11/15/2018 (ZAIC_000083)	Will be used
73.	12/7/2018 Oklahoma Corporation Commission Form K, Fredy Valle, Progressive Northern Insurance Company, coverage cancelled effective 1/11/2019 (ZAIC_000084)	Will be used
74.	12/10/2018 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 1/11/2019 (ZAIC_000085)	Will be used
75.	12/18/2018 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 12/18/2018 (ZAIC_000086)	Will be used
76.	12/5/2019 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 7/12/2019 (ZAIC_000087)	Will be used
77.	Certified copy of ZAIC policy No. BAP 9809603-04 issued to Silver Star Construction, effective dates 04/01/19-04/01/2020 (ZAIC_000088-ZAIC_000156)	Will be used
78.	07/8/2020 Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000157-ZAIC_000163)	May be used
79.	9/16/2020 Answer of ORD Trucking filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000164-ZAIC_000170)	May be used
80.	1/22/2021 Answer of Defendant Israel Juarez filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000171-ZAIC_000176)	May be used
81.	4/8/2021 Plaintiff's First Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000177-ZAIC_000183)	May be used
82.	7/29/2021 Transcript of Deposition of Israel Juarez (ZAIC_000184-ZAIC_000272)	May be used
83.	08/10/2021 Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000273-ZAIC_000277)	May be used
84.	9/7/2021 Combined Answer of Israel Juarez to Plaintiff's Petition, Plaintiff's First Amended Petition, and Plaintiff's	May be used



	Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000278-ZAIC_000282)	
85.	9/7/2021 Defendant ORD Trucking's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000283-ZAIC_000291)	May be used
86.	9/27/2021 Defendant Silver Star Construction Company's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000292-ZAIC_000304)	May be used
87.	5/2/2022 Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000305-ZAIC_000311)	May be used
88.	Defendant Silver Star Construction Company's Answers to Plaintiff's First Set of Interrogatories (ZAIC_000312-ZAIC_000334)	May be used
89.	Defendant Silver Star Construction Company's Responses to Plaintiff's First Request for Admission (ZAIC_000335-ZAIC_000341)	May be used
90.	Defendant Silver Star Construction Company's Answers to Plaintiff's First Requests for Production (ZAIC_000342-ZAIC_000372)	May be used
91.	Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking Responses to Plaintiff's First Set of Discovery Requests (ZAIC_000373-ZAIC_000391)	May be used
92.	7/15/2022 Defendant Silver Star Construction Company's Amended Answer to Plaintiff's Second Amended Petition and Cross-Claims against Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking (ZAIC_000392-ZAIC_000422)	May be used
93.	8/8/2022 Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Cross-Claim of Silver Star Construction (ZAIC_000423-ZAIC_000427)	May be used
94.	ORD Trucking's Responses to Plaintiff's First Set of Discovery Requests.	May be used
95.	Israel Juarez's Responses to Plaintiff's First Set of Discovery Requests.	May be used

96.	Tylon Mackey's Responses to ORD Trucking's First Set of Discovery Requests.	May be used
97.	2/7/2019 Hauling Service Agreement between Valle Trucking and Silver Star Construction Company (ZAIC_000428-ZAIC_000435) (duplicate of No. 106)	Will not use (duplicate)
98.	2/8/2019 Certificate of Liability Insurance, Berkshire Hathaway Homestate Ins. Co. to Fredy N. Valle, Sr. d/b/a Valle Trucking listing Silver Star Construction and its Subsidiaries as an additional insured (ZAIC_000436-ZAIC_000437)	Will be used
99.	Uncertified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/19 to 2/11/20 (ZAIC_000438-ZAIC_000472)	May be used
100.	Certified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/2019 to 2/11/2020	Will be used
101.	2/12/2019 Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder (ZAIC_000473)	Will be used
102.	2/20/2019 Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder (ZAIC_000474)	Will be used
103.	9/5/2019 Certificate of Liability Insurance, Progressive Northern Insurance Company to Fredy Valle, Valle Trucking listing Silver Star Construction and its Subsidiaries as Certificate Holder (ZAIC_000475)	Will be used
104.	9/27/2021 Letter from ZAIC to Fredy Valle demanding Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_000476-ZAIC_000478)	Will be used
105.	11/15/2021 Email from J. Chris Horton to <a href="mailto:Valletrucking51@yahoo.com">Valletrucking51@yahoo.com</a> re: attaching filings from underlying lawsuit and Demand from ZAIC to Valle Trucking (ZAIC_000479-ZAIC_480)	May be used
106.	4/8/2021 Plaintiff's First Amended Petition filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000481-ZAIC_000487) (duplicate of No. 81)	Will not use (duplicate)

107.	8/10/2021 Plaintiff's Second Amended Petition filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000488-ZAIC_000494) (duplicate of No. 83)	Will not use (duplicate)
108.	5/20/2021 Certificate of Service by Mail filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000495-ZAIC_000498)	May be used
109.	11/15/2021 Letter from ZAIC to Fredy Valle re: demand that Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_0000499-ZAIC_000501)	Will be used
110.	2/7/2019 Hauling Service Agreement between Valle Trucking and Silver Star Construction Company (ZAIC_000502-ZAIC_000509)	Will be used
111.	5/17/2022 Letter from ZAIC to Great Lakes Insurance SE demanding Great Lakes to defend and indemnify Silver Star Construction Company (ZAIC_000510-ZAIC_000512)	Will be used
112.	5/17/2022 Letter from ZAIC to Progressive Northern Insurance Company demanding Progressive to defend and indemnify Silver Star Construction Company (ZAIC_000513-ZAIC_000515)	Will be used
113.	5/17/2022 Letter from ZAIC to Berkshire Hathaway Homestate Ins. Co. demanding Berkshire Hathaway to defend and indemnify Silver Star Construction Company (ZAIC_000516-ZAIC_000518)	Will be used
114.	5/25/2022 Letter from Chris Horton to Jeffrey Curran, counsel for Fredy Valle d/b/a Valle Trucking, re: demand that Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_000519-ZAIC_000522)	Will be used
115.	6/20/2022 Letter from Berkshire Hathaway to ZAIC re: declining to accept tender (ZAIC_000523)-ZAIC_000524)	May be used
116.	8/9/2022 Letter from International Programs Group to Silver Star Construction Company, Chris Horton, and ZAIC re: Notice of Reservation of Rights (ZAIC_000525-ZAIC_000535)	Will be used
117.	Correspondence from Progressive to Shelter Insurance dated 2/7/2023	May be used
118.	Correspondence from Silver Star's counsel to Progressive dated 9/19/2022	May be used

119.	Correspondence from Progressive to Valle Trucking dated 2/7/2023.	May be used
120.	Correspondence from Progressive to Valle Trucking dated 2/8/2023.	May be used
121.	4/4/2022 Great Lakes' Notice of Reservation of Rights to Valle Trucking.	May be used
122.	5/25/2022 Letter from J. Chris Horton to Jeffrey A. Curran re: demand for defense and indemnity of Silver Star in the litigation.	May be used
123.	11/15/2021 Email from Chris Horton to Valle Trucking's Mr. Monge re: asking him to provide the lawsuit and ZAIC's letter to his insurance company.	May be used
124.	2/8/2019 Fax from Wanadaly Cruz, licensed insurance producer, to Great Lakes with Certificate of Insurance listing Berkshire as insurer.	May be used
125.	9/4/2019 Official Oklahoma Traffic Collision Report (Case No. 2019-26398)	May be used
126.	8/10/2021 Summons to Silver Star with Plaintiff's Second Amended Petition.	May be used
127.	8/8/2022 Notice of Reservation of Rights to Silver Star and Chris Horton from International Programs Group.	May be used
128.	2/10/2022 Email from Kenneth A. Shaw at Richey Ins to <a href="mailto:j.f.thill@jplush.com">j.f.thill@jplush.com</a> (John) re: Got this memo today. Please review. <ul style="list-style-type: none"> <li>Includes forwarded 2/10/2022 email from Casey Ryan at ZAIC to Richey Ins re; reporting claim for claimant Tylon Mackey for date of loss 9/4/2019, with attachments.</li> </ul>	May be used
129.	2/17/2022 International Programs Group Letter to Valle Trucking re: reviewing the lawsuit and will advise regarding his request for defense and indemnity. Acknowledges Valle not yet been served, recommends he contact his attorney to protect his interests.	May be used
130.	10/4/2021 Letter from ZAIC to Fredy Valle re: demanding defense and indemnity by Valle for Silver Star.	May be used
131.	2/14/2022 Email from John Thill to Terri Singleton re: the application we have shows the contact person as Freddy Napoleon Valle Arana and the phone number 405-501-8005 <ul style="list-style-type: none"> <li>Includes 2/14/23 email from Terri Singleton to Mr. Shaw re: claim assigned to me for handling.</li> </ul>	May be used

	<ul style="list-style-type: none"> <li>Includes 2/11/22 email from <a href="mailto:j.f.thill@jplush.com">j.f.thill@jplush.com</a> to IPG Claims New Loss Notification.</li> </ul>	
132.	<p>2/11/2022 Email from Jessica Christopher to Samantha Porbeck, IPG Claims New Loss Notification, and Terri Singleton re: Set up as 77889</p> <ul style="list-style-type: none"> <li>Includes 2/11/22 email from Samantha Porbeck to IPG Claims New Loss Notification re: Please assign to Terri.</li> </ul>	May be used
133.	2/15/2022 Email from Terri Singleton to <a href="mailto:newclaims@eandsclaims.com">newclaims@eandsclaims.com</a> re: ZAIC is requesting defense for the lawsuit due to the Hauling Service Agreement.	May be used
134.	08-29-2019 Valle Trucking Invoice/Field Ticket No. 5524 to Silver Star Construction Company, Inc.	May be used
135.	08-29-2019 Valle Trucking Invoice/Field Ticket No. 5525 to Silver Star Construction Company, Inc.	May be used
136.	08-29-2019 Valle Trucking Invoice/Field Ticket No. 5527 to Silver Star Construction Company, Inc.	May be used
137.	08-29-2019 Valle Trucking Invoice/Field Ticket No. 5561 to Silver Star Construction Company, Inc.	May be used
138.	08-29-2019 Valle Trucking Invoice/Field Ticket No. 5563 to Silver Star Construction Company, Inc.	May be used
139.	09-03-2019 Valle Trucking Invoice/Field Ticket No. 5008 to Silver Star Construction Company, Inc.	May be used
140.	09-03-2019 Valle Trucking Invoice/Field Ticket No. 5528 to Silver Star Construction Company, Inc.	May be used
141.	09-03-2019 Valle Trucking Invoice/Field Ticket No. 5536 to Silver Star Construction Company, Inc.	May be used
142.	09-04-2019 Valle Trucking Invoice/Field Ticket No. 5009 to Silver Star Construction Company, Inc.	May be used
143.	09-04-2019 Valle Trucking Invoice/Field Ticket No. 5562 to Silver Star Construction Company, Inc.	May be used
144.	09-04-2019 Valle Trucking Invoice/Field Ticket No. 5574 to Silver Star Construction Company, Inc.	May be used
145.	09-04-19 Valle Trucking Invoice/Field Ticket No. 5613 to Silver Star Construction Company, Inc.	May be used
146.	Medical Records of Tylon Mackey produced in Payne County, Oklahoma District Court Case No. CJ-2020-233.	May be used
147.	Medical Bills of Tylon Mackey produced in Payne County, Oklahoma District Court Case No. CJ-2020-233.	May be used
148.	7/29/2021 Video Deposition of Israel Juarez.	May be used

149.	7/20/2023 Deposition of Jesus Ordonez.	May be used
150.	2/15/2022-2/16/2022 Claim notes of Great Lakes.	May be used
151.	All pleadings, motions, and orders filed in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
152.	All discovery exchanged in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
153.	All discovery exchanged in the instant action	May be used
154.	Transcripts of all depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
155.	Transcripts of all depositions taken in the instant action	May be used
156.	Expert reports of all experts identified by any party to this action	May be used
157.	Expert reports of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
158.	Expert CVs of all experts identified by any party to this action	May be used
159.	Expert CVs of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
160.	Expert invoices for time spent by all experts identified by any party to this action	May be used
161.	Expert invoices for all time spent by all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
162.	Expert prior testimony history for all experts identified by any party to this action	May be used
163.	Expert prior testimony history for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
164.	Expert publications for all experts identified by any party to this action	May be used
165.	Expert publications for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used

166.	All documents exchanged by Progressive with its Initial Disclosures in this action unless otherwise objected to by ZAIC	May be used
167.	All documents exchanged by Great Lakes with its Initial Disclosures in this action unless otherwise objected to by ZAIC	May be used
168.	All documents exchanged by ZAIC with its Initial Disclosures in this action unless otherwise objected to by ZAIC	May be used
169.	All documents produced in response to Subpoenas in this action	May be used
170.	All documents produced in response to Subpoenas in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
171.	All documents exchanged in discovery in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
172.	All documents exchanged in discovery in the instant action unless otherwise objected to by Silver Star.	May be used
173.	All deposition exhibits of depositions taken in this action unless otherwise objected to by Silver Star.	May be used
174.	All deposition exhibits of depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by Silver Star.	May be used
175.	All verified discovery responses from this action unless otherwise objected to by ZAIC	May be used
176.	All verified discovery responses in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by Silver Star.	May be used
177.	Plaintiff's Answers to ZAIC's Interrogatories	May be used
178.	Progressive's Answers to ZAIC's Interrogatories	May be used
179.	Plaintiff's Responses to ZAIC's Requests for Production	May be used
180.	Progressive's Responses to ZAIC's Requests for Production	May be used
181.	Progressive's Responses to ZAIC's Requests for Admission	May be used



182.	Exhibits identified in Great Lakes' responses to ZAIC's discovery requests.	May be used
183.	Exhibits identified in Progressive's responses to ZAIC's discovery requests.	May be used
184.	Exhibits identified by ongoing discovery in this action.	May be used
185.	Exhibits identified by ongoing discovery in the underlying action.	May be used
186.	All exhibits listed by ZAIC in this case not otherwise objected to by Silver Star.	May be used
187.	All exhibits listed by Plaintiff in this case not otherwise objected to by Silver Star.	May be used
188.	All exhibits listed by Progressive in this case not otherwise objected to by Silver Star.	May be used
189.	Affidavits or other documents needed for the identification and authentication of records.	May be used
190.	All materials considered or relied upon by experts in forming their opinions.	May be used
191.	All exhibits necessary for rebuttal or impeachment.	May be used
192.	Any exhibits identified as discovery progresses in this matter.	May be used

Respectfully Submitted,

/s/ James A. Scimeca

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of September 2023, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system:

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